

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

GLORIA FRIC,  
Plaintiff

VS.

ALLSTATE LIFE INSURANCE  
COMPANY,  
Defendant

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CIVIL NO. 6:21-CV-00042  
(JURY DEMANDED)

**PLAINTIFF'S PROPOSED**  
**JURY QUESTIONNAIRE (VOIR DIRE)**

NOW COMES, Plaintiff, Gloria Fric, and makes and files this Plaintiff's Proposed Jury Questionnaire (Voir Dire) in the above numbered and styled cause.

Respectfully submitted,

COLE, COLE, EASLEY & SCIBA, P.C.  
302 W. Forrest  
Victoria, Texas 77901  
(361) 575-0551 - Telephone  
Email: [jcole@colefirmsservice.com](mailto:jcole@colefirmsservice.com)

*/s/ Jim Cole*

BY: \_\_\_\_\_

JIM COLE  
State Bar No. 04538500  
Federal Bar No. 5883  
Samuel Cole  
State Bar No.: 24099154  
**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

By my signature above, I certify that a true and correct copy of the foregoing instrument was mailed or delivered to all counsel of record in accordance with the applicable Federal Rules of Civil Procedure on this the 29<sup>th</sup> day of September 2022.

**PROPOSED JURY QUESTIONNAIRE (VOIR DIRE)**

1. Do you or anyone close to you have any employment, education, training, policy development, volunteer experience, or other experience in the following areas?  
(Check Yes or No for each)

		Yes	No
a	Evaluation, review, or investigation of claims		
b	Investigation of people		
c	Law enforcement or investigation		
d	Journalism, media		
e	Law or the legal system		
f	Ministry, theology or religious order		
g	The court system		
h	Attorney law firm or law office		

(a.) If yes to any of the above categories, please describe.

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2. Do you know anyone who works for a lawyer, law firm or court? \_\_\_\_\_ Yes \_\_\_\_\_ No

a. If yes, please explain. \_\_\_\_\_

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3. Have you ever made an insurance claim? \_\_\_\_\_ Yes \_\_\_\_\_ No

a. If yes, how many? \_\_\_\_\_

b. For each claim, please describe the circumstances.

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4. What is your marital status: (check all that apply)

- ☐ Single and never married  
☐ Living with non-marital partner for \_\_\_\_ years  
☐ Married: How long? \_\_\_\_ years  
☐ Divorced, but married in the past for \_\_\_\_ years  
☐ Widowed, but married in the past for \_\_\_\_ years  
☐ Separated  
 Other: \_\_\_\_\_

If you are separated, divorced or widowed, please complete the following questions regarding your former spouse or partner. If you are currently married, please complete information regarding your current spouse.

5. Spouse or partner's employment status:

- ☐ Employed full time                      ☐ Unemployed  
☐ Employed part time                      ☐ Retired  
☐ Homemaker                                  ☐ Disabled  
☐ Student                                      ☐ Other

What is or was the occupation of your spouse or partner and who is or was their employer?

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6. Please describe what they do or did at their job and any other jobs or work they have done in the past ten years.

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7. Do you have children or stepchildren? ☐ Yes ☐ No

a. If yes, please list:

<i>Gender</i>	<i>Age</i>	<i>Does child live with you?</i>		<i>Education</i>	<i>Occupation</i>
		<i>Yes</i>	<i>No</i>		

What are/were your parents' current or most recent occupations and employers before retirement or death?

8. Mother's occupation: \_\_\_\_\_

9. Father's occupation: \_\_\_\_\_

10. Step-Mother's occupation: \_\_\_\_\_

11. Step-Father's occupation: \_\_\_\_\_

12. Does any **adult** other than you or your spouse live in your household? \_\_\_\_\_ Yes \_\_\_\_\_ No

(a.) If yes, please state their relationship to you and their occupation. \_\_\_\_\_

\_\_\_\_\_

13. What was your major and/or minor area of study in school? \_\_\_\_\_

\_\_\_\_\_

14. What special training, experience, knowledge or skills do you have, including those acquired on-the-job?

\_\_\_\_\_

\_\_\_\_\_

15. Do you plan to attend school? \_\_\_\_\_ Yes \_\_\_\_\_ No

(a.) If yes, what will you study?

\_\_\_\_\_

16. What, if any, is your religious preference? \_\_\_\_\_

17. What offices, if any, have you held with your religious congregation? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

18. Have you ever served as a juror before? \_\_\_\_\_ Yes \_\_\_\_\_ No

(a.) If yes, please complete for each case on which you served.

<i>Civil or Criminal</i>	<i>Charges/Allegations</i>	<i>Year</i>	<i>Did the jury reach a verdict? (Yes or No)</i>

19. How would you describe your overall experience as a juror?

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20. In a legal matter, have you or anyone close to you ever: (check all that apply)

\_\_\_\_\_ sued? \_\_\_\_\_ been sued? \_\_\_\_\_ been a witness in a lawsuit?

(a.) If so, who and when? \_\_\_\_\_

(b.) What was the nature of the case? \_\_\_\_\_

(c.) Where was the court in which the case was heard? \_\_\_\_\_

(d.) Did the case go to trial? \_\_\_\_\_ Yes \_\_\_\_\_ No

(e.) Was a verdict reached? \_\_\_\_\_ Yes \_\_\_\_\_ No

(f.) Were you satisfied with the result? \_\_\_\_\_ Yes \_\_\_\_\_ No

(g.) List the attorneys in the matter and who they represented:

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21. Have you ever used the services of a lawyer for any reason, other than divorce?

\_\_\_\_\_ Yes \_\_\_\_\_ No

(a.) If yes, what were the circumstances? \_\_\_\_\_

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22. Do you know any attorneys or judges? \_\_\_\_\_ Yes \_\_\_\_\_ No

(a.) If yes, please identify who they are and your relationship to them: \_\_\_\_\_

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23. Do you follow state and local politics? (Candidates, issues, trends) \_\_\_\_\_ Yes \_\_\_\_\_ No

24. What political issues have you been most concerned with over the last 10 years?

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25. Do you have any military experience? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain the branch of service. \_\_\_\_\_

26. Have you or any close relatives or friends ever sought or held any political office?

\_\_\_\_ Yes \_\_\_\_ No

If Yes, Who, and Which office? \_\_\_\_\_

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27. Have you ever voted for or against a politician based on his/her views or policies towards the civil justice system? \_\_\_\_\_ Yes \_\_\_\_\_ No

Please explain: \_\_\_\_\_

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28. Which political party to you most closely identify with?

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29. What local or regional newspapers do you read?

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30. How often do you read them?

\_\_\_\_\_ Every day \_\_\_\_\_ Weekly \_\_\_\_\_ Monthly \_\_\_\_\_ Quarterly or less  
\_\_\_\_\_ Seldom

(a.) What portions do you read? (i.e. front page, metro, sports, editorials, crime stories, etc.)

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31. What newspapers, magazines, and journals do you read regularly? \_\_\_\_\_

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32. Have you or any members of your family or close friends ever owned or operated your own business?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

33. What are your hobbies, favorite recreations, or pastimes? \_\_\_\_\_

\_\_\_\_\_

34. Please list 3 people you admire the most:

a. \_\_\_\_\_

b. \_\_\_\_\_

c. \_\_\_\_\_

35. Please list 3 people you admire the least:

a. \_\_\_\_\_

b. \_\_\_\_\_

c. \_\_\_\_\_

**For the following entities, please indicate how you feel about them. Use a scale, from 1 to 7, where 1 is “feel extremely negative” and 7 is “feel extremely positive” and you may use any number in between as well. If you have not heard of the entity, write “N/A.”**

36. Personal injury lawyers?

Extremely Negative 1 2 3 4 5 6 7 Extremely Positive

37. Large American companies, in general?

Extremely Negative 1 2 3 4 5 6 7 Extremely Positive

38. People file lawsuits as a way to blame others for the bad things that inevitably happen in life.  
(Check one)

\_\_\_\_\_ 1. Agree

\_\_\_\_\_ 2. Disagree

\_\_\_\_\_ 3. Don't know

39. People take too little responsibility for their own actions these days. (Check one)

- \_\_\_\_\_ 1. Agree  
\_\_\_\_\_ 2. Disagree  
\_\_\_\_\_ 3. Don't know

40. Sometimes lawyers file lawsuits in an attempt to take unfair advantage of wealthy corporations. (Check one)

- \_\_\_\_\_ 1. Agree  
\_\_\_\_\_ 2. Disagree  
\_\_\_\_\_ 3. Don't know

**How much do you disagree or agree with the following opinions? Circle a number between 1 and 7, where 1 is "Disagree strongly" and 7 is "Agree strongly," and you may use any number in between as well.**

41. People often target large corporations for million dollar lawsuits because corporations have lots of money, not because they have done anything wrong.

Disagree Strongly   1   2   3   4   5   6   7   Agree Strongly

42. Most lawsuits are frivolous.

Disagree Strongly   1   2   3   4   5   6   7   Agree Strongly

43. There are too many lawsuits.

Disagree Strongly   1   2   3   4   5   6   7   Agree Strongly

44. Lawsuits are costing us all too much money.

Disagree Strongly   1   2   3   4   5   6   7   Agree Strongly

The following are types of damages that people can seek money for in a lawsuit. If there was evidence for it, would you be willing to award money for:

45. Attorneys' fees? \_\_\_\_\_ Yes   \_\_\_\_\_ No

46. Punitive damages? \_\_\_\_\_ Yes   \_\_\_\_\_ No

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47. If "No" to any of the above, please explain why not.

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48. What are your feelings or opinions about people who bring personal injury lawsuits?

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49. Do you or any members of your immediate family have any strong opinions about lawsuits?

☐ Yes ☐ No

If yes, please explain: 

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50. Do you have personal or family responsibilities (such as full-time care of a young child or of an ill or elderly person) that would interfere with your service as a juror?

☐ Yes ☐ No

If yes, please explain: 

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51. Other reasons why you could not serve: 

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52. After completing this questionnaire, is there any reason at all (for example, religious, political or personal) that would make it difficult for you to be a fair and impartial juror in this case?

☐ Yes ☐ No

(a.) If yes, please explain:

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Is there anything else the Court should know that might affect your ability to serve as a juror (e.g., abuse, emotional difficulties, concerns about the case subject, etc.)? If there is something that you would rather discuss in private with the Court, please indicate below:

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53. Would you like to serve as juror in this case? \_\_\_\_\_ Yes \_\_\_\_\_ No

Please explain your answer:

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54. Is there anything additional you feel is important for the Court to know about you?

Yes \_\_\_\_\_ No \_\_\_\_\_

(a.) If yes, please explain:

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55. Any comments you wish to make?

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56. Is there anything else about you, or any other life experiences you've had that you think the lawyers or the Court should know about as it pertains to your possible service as a juror in this case? Please explain below.

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### More case specific questions

57. Do you, any close friends, or any members of your family know or have any association with any of the following? (Please review the list below and then check yes or no.)

Law Firm or Attorney	Don't Know	Know (Explain how you know them)
Cole, Cole, Easley & Sciba, P. C.		
Jim Cole		
Sam Cole		
Will Sciba		
Bressler, Amery & Ross, P.C.		
David Donahue		
Louis Mendez		
Donald Littlefield		
Susan Logsdon		

Prospective Witness	Don't Know	Know (Explain how you know them)
Gloria Fric		
Roland Grote		
Janet Dever		
Eugene Sanford		

### Attorney Voir Dire Plaintiff

58. What makes you good at your job?
59. Is anyone here involved in overseeing insurance claims?
60. Have you, or has anyone close to you, ever had any experience making an insurance claim with Allstate? If yes, what was that experience like?

### Lawsuits / Damages

61. Some people think that when an individual sues, often that person is just trying to get some easy money. Who agrees with that statement?
- Tell me more. Why do you think that?
  - How would you judge a true lawsuit from an “easy money” lawsuit?
62. In this case, my client, Gloria Fric is suing Allstate Life Insurance Company, for failing to pay on a life insurance policy after her husband died. The law allows Mrs. Fric to sue Allstate Life Insurance Company. – Does anyone have any concern about this lawsuit? Please explain.
63. We intend to prove to you that the fair and reasonable amount of damages in this case is \$\_\_\_\_\_. That is a lot of money. Who thinks that sounds like too much?

### Conclusion

64. Anything we did not cover that you think is relevant to this case?